BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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And Related Matter.	Investigation 14-06-016

PACIFIC GAS AND ELECTRIC COMPANY'S (U 39 G) OPENING BRIEF ON APPLICATION OF THE $850 MILLION DISALLOWANCE FOR SAFETY-RELATED PROJECTS AND PROGRAMS

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Dated: July 7, 2016

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas and Electric Company Proposing Cost of Service and Rates for Gas Transmission and Storage Services for the Period 2015-2017. U 39 G	Application 13-12-012 (Filed December 19, 2013)
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In D.16-06-056, Ordering Paragraph 63, the Commission authorized parties to brief how the $850 million disallowance for safety-related projects or programs adopted in D.15-04-024 should be applied to expenses and capital expenditures authorized for funding in PG&E's 2015 Gas Transmission and Storage Services rate proceeding. Ordering Paragraph 63 provides that Opening Briefs should "[i]dentify the authorized safety related programs and project expenses [and capital expenditures] that would be offset by the $850 million penalty."

In PG&E's June 1, 2015 Response to Administrative Law Judge's Ruling Requiring information To Implement The San Bruno Penalty Decision, PG&E identified the capital and expense projects and programs that PG&E believes meet the Commission's definition of "safety related," the costs of which should be offset by the $850 million penalty. PG&E continues to believe that the programs and projects it identified in its June 1, 2015 pleading are the appropriate programs and projects for the offset, with two exceptions. The two exceptions are the capital and expense costs associated with PG&E's Routine Spending for Compression and Processing (Asset Family – Facilities). PG&E had originally believed that these costs met the Commission's definition of "safety related" because they include work to repair or replace valves and other transmission pipeline equipment. However, PG&E has since more closely examined

the work it performs in this area and determined that the vast majority of the work relates to compressor equipment rather than pipeline equipment. Accordingly, PG&E does not believe that this work should be categorized as "safety related" for purposes of determining the costs that should be offset by the $850 million penalty.

Appendix A to this Opening Brief identifies the capital projects and programs that PG&E believes the Commission should find to be "safety related," and Appendix B identifies the expense projects and programs that PG&E believes the Commission should find to be "safety related." These appendices are identical to the appendix PG&E included with its June 1, 2015 filing, other than the classification of the Routine Spending for Compression and Processing, just discussed. This change is reflected in redlining. PG&E requests that the Commission authorize PG&E to record to the Shareholder Funded Gas Transmission Safety Account (SFGTSA) the safety related costs it incurs or has incurred since January 1, 2015 in these categories, up to the amounts the Commission adopted in D.16-06-056, through 2018 or until such earlier time as PG&E has recorded the full $850 million to the SFGTSA.

Respectfully submitted,

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Dated: July 7, 2016

PACIFIC GAS AND ELECTRIC COMPANY
2015 GAS TRANSMISSION AND STORAGE RATE CASE
SUMMARY OF CAPITAL PROGRAMS

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
1	4A	Transmission Pipe Integrity and Emergency Response Programs	ILI	Yes	Testing that assesses the integrity and safety of gas transmission pipelines.
2			Hydrostatic Testing	Yes	Testing that assesses the integrity and safety of gas transmission pipelines; also required to validate maximum allowable operating pressure of gas transmission pipelines.
3			Earthquake Fault Crossings	Yes	Fault Crossing Program mitigates the time independent threat of weather-related or outside forces for gas transmission pipelines. Mitigation includes pipe replacements, relocations, and other pipe enhancements.
4			Vintage Pipe Replacement	Yes	This program replaces transmission line pipe where the stable/resident threat associated with vintage fabrication and construction interacts with the threat of land movement.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
5			Geo-hazard Threat Identification	Yes	Geo-hazard identification and monitoring mitigates against the time independent threat of the weather-related outside forces for gas transmission pipelines. The program is intended to improve the accuracy of geo-hazard threat identification data needed for pipe replacement activities. It involves mitigation of geo-hazard threats through pipe replacements and/or relocations.
6			Valve Automation	Yes	Valve Automation program involves the installation of automated valves to address the risks associated with timely emergency response to pipeline ruptures. This results in enhancements to transmission lines to improve safety.
7			Inoperable and Hard to Operate Valves	Yes	The In-Operable and Hard-to-Operate Valves program mitigates the threat of inadequate emergency response by repairing or replacing valves on gas transmission pipelines.
8	4B	Transmission Pipe Engineering Programs	Class Location Program	Yes	The Class Location Program identifies locations on PG&E's pipelines that have changed class due to population density changes. Mitigation, including pipe replacement or hydrostatic testing, may be required to ensure safe operations.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
9			Water and Levee Crossing Program	Yes	The Water and Levee Crossing Program mitigates time independent threats and risks associated with transmission pipes in proximity of water and levee crossings. Mitigations such as pipe replacement or hydrostatic testing may be required to ensure safe operations.
10			Shallow Pipe Program	Yes	The Shallow Pipe Program identifies, prioritizes and mitigates locations where transmission pipeline has insufficient cover and is vulnerable to exposure from third parties. Mitigation may include pipe replacement, relocation, or addressing inadequate cover.
11			Gas Gathering Program	No	This program supports continued retirement of PG&E's gas gathering facilities. This was based on direction provided by the CPUC regarding concerns on reasonableness of the costs associated with gas gathering facilities. This program is focused on financial rather than safety considerations.
12			Work Requested by Others Program	No	The primary driver of WRO work is related to public improvement work (new construction for freeways, residential/commercial subdivisions) and not pipeline safety.
13	5	Asset Family - Storage	WELL- Storage Well Work	No	This program is focused on storage facilities, and has no direct impact on line pipe safety.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
14			WELL - Well Overflow Protection	No	This program is focused on storage facilities, and has no direct impact on line pipe safety.
15	6	Asset Family - Facilities	Burney K-2 Compressor Replacement	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
16			Los Medanos K-1 Compressor Replacement	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
17			Compressor Unit Control Replacements	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
18			Upgrade Station Controls	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
19			Emergency Shutdown System Upgrades	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
20			Rebuild Santa Rosa Compressor Station Electrical Substation	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
21			Upgrade Pleasant Creek Processing Equipment	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
22			GT Electrical Upgrades - Hinkley and Topock Compressor Stations	No	This program is focused on station facilities, and has no direct impact on line pipe safety.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
23			GT Electrical Upgrades - Compressor Stations (excludes Hinkley, Topock)	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
24			Physical Security	No	This program includes projects to enhance security measures at critical facilities that impact line pipe safety and protect employees, contractors and the public, but does not meet the safety-related definition.
25			Hinkley Compressor Unit Retrofit Project	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
26			Install Active Fire Suppression Systems	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
27			Routine Capital Spending - C&P	~~Yes~~ No	Typical projects include repair or replacement of failed or malfunctioning equipment and instrumentation including station valves and actuators and other components needed for transmission pipe overpressure protection to ensure the safe operation of transmission line pipe, but primarily relate to compression assets.
28			Perform Simple Station Rebuilds	No	This program is focused on station facilities, and has no direct impact on line pipe safety.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
29			Perform Complex Station Rebuilds	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
30			Perform Transmission Terminal Upgrades	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
31			Gas Transmission SCADA Visibility	Yes	This program provides for additional pressure and flow measurement sensors that will be connected to PG&E's Gas Transmission SCADA system. This results in enhancements to transmission lines to improve safety.
32			Replace Obsolete Bristol Controllers	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
33			Replace Obsolete Limitorque Valve Actuators	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
34			Electric Upgrades Program	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
35			Becker System Upgrades	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
36			Biomethane Interconnects	No	Assembly Bill 1900, chaptered into law on September 27, 2012 (Chapter 602, Statutes of 2012), establishes a process to promote and facilitate the injection and use of biomethane into common carrier pipelines. Limited impact to GT pipeline safety.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
37			Routine Capital Spending - M&C	Yes	Typical projects include repair or replacement of failed or malfunctioning equipment and instrumentation including station valves and actuators and other components needed for transmission pipe overpressure protection to ensure the safe operation of transmission line pipe.
38			Bethany Unit Replacement	No	No forecast in Rate Case period
39			Gill Ranch	No	No forecast in Rate Case period
40			McDonald Island Processing Equipment Replacement	No	No forecast in Rate Case period
41			Prior Compression Replacement	No	No forecast in Rate Case period
42			Topock Install Suction Separation	No	No forecast in Rate Case period
43			Hinkley Install Suction Separation	No	No forecast in Rate Case period

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
44	7	Corrosion Control Program	CP Systems - Replace	Yes	Over time, CP systems (comprised of anodes and rectifiers) need to be replaced. Anodes deplete to a point at which they no longer provide adequate levels of protection to the pipeline. Rectifiers also degrade over time from environmental exposure. These replacements result in enhancements to transmission lines to maintain safety.
45			CP Systems - New	Yes	PG&E plans to install new CP systems on transmission pipelines where CP levels are determined to be inadequate. Inadequate CP can be caused by a variety of factors including coating deterioration, new pipeline construction, or interference from other direct current sources such as other underground utilities utilizing CP or transit systems like BART and MUNI. These installations result in enhancements to transmission lines to improve safety.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
46			Coupon Test Stations	Yes	Coupon Test Stations perform electrical measurement to determine the adequacy of cathodic protection. PG&E plans to install coupon test stations to monitor cathodic protection at approximately every mile along the transmission system. These installations result in enhancements to CP monitoring and testing capability for transmission lines to improve safety.
47			AC Interference Mitigation	Yes	External corrosion can be exacerbated by the presence of electrical interference. This can occur with the presence of AC interference. The AC interference mitigation program involves addressing transmission pipelines where this interference exists. These mitigation activities address this corrosion threat to transmission lines to improve safety.
48			DC Interference Mitigation	Yes	External corrosion can be exacerbated by the presence of electrical interference. This can occur with the presence of DC interference. The DC interference mitigation program involves addressing transmission pipelines where this interference exists. These mitigation activities address this corrosion threat to transmission lines to improve safety.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
49			Casings	Yes	Casings require both annual routine monitoring (a form of inspections) and mitigation as appropriate. These mitigation activities address corrosion threats to transmission lines to improve safety.
50			Internal Corrosion	Yes	The Internal Corrosion program mitigates the risk of internal corrosion through site-specific Internal Metal Loss Action Plans that contain internal corrosion control monitoring, testing and inspection requirements. This program includes installation of chemical injection pumps, Electron Microscopy coupon mounting devices, and permanently mounted Ultrasonic Thickness sensors, all of which address threats to the safety of PG&E's gas transmission line pipe.
51	9	Program Management Office	Program Management Office	Yes	Program covers the management of pipeline safety projects.
52	10	Gas System Operations	New Business	No	This program is focused on serving new load, and does not meet the safety-related definition.
53			Meter Sets - Power Plant	No	This program is focused on serving new load, and does not meet the safety-related definition.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
54			Capacity (NOP Program)	Yes	In order to minimize instances of incidental over-pressurizations, PG&E is programmatically lowering its regulator and overpressure protection set points through the NOP program and must, in some cases, complete capacity additions in order to maintain the ability to serve firm customers during extreme weather events. This category only includes the NOP program, not other capacity programs.
55	11	Information Technology	Gas Transmission IT Projects	No	These IT projects have no direct impact on line pipe safety.
56	12	Other GT&S Support Plans	Tools and Equipment	No	This program includes costs related to purchasing tools and equipment. This program has no direct impact on line pipe safety.
57			Manage Buildings	No	This program includes office facilities and yards. This program has no direct impact on line pipe safety.

PACIFIC GAS AND ELECTRIC COMPANY
2015 GAS TRANSMISSION AND STORAGE RATE CASE
SUMMARY OF EXPENSE PROGRAMS

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
1	4A	Transmission Pipe Integrity and Emergency Response Programs	ILI	Yes	Testing that assesses the integrity and safety of gas transmission pipelines.
2			Direct Assessment	Yes	Testing that assesses the integrity and safety of gas transmission pipelines.
3			Hydrostatic Testing	Yes	Testing that assesses the integrity and safety of gas transmission pipelines; also required to validate maximum allowable operating pressure of gas transmission pipelines.
4			Earthquake Fault Crossings	Yes	Fault Crossing Program mitigates the time independent threat of weather-related or outside forces for gas transmission pipelines. Mitigation includes pipe replacements, relocations, and other pipe enhancements.
5			Geo-Hazard Threat Identification	Yes	Geo-hazard identification and monitoring mitigates against the time independent threat of the weather-related outside forces for gas transmission pipelines. The program is intended to improve the accuracy of geo-hazard threat identification data needed for pipe replacement activities.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
6			Programs to Enhance Integrity Management	Yes	Root Cause Analysis (RCA) and Risk Analysis support the analysis and mitigation determination of the ASME B31.8S threats related to gas transmission pipelines.
7			Public Awareness	No	The Public Awareness Program mitigates the threat of inadequate emergency response related to gas transmission pipelines but does not meet the definition of "safety-related."
8			Inoperable and Hard to Operate Valves	Yes	The In-Operable and Hard-to-Operate Valves program mitigates the threat of inadequate emergency response by repairing or replacing valves on gas transmission pipelines.
9	4B	Transmission Pipe Engineering Programs	Class Location Program	Yes	The Class Location Program identifies locations on PG&E's pipelines that have changed class due to population density changes. Mitigations such as pipe replacement or hydrostatic testing, may be required to ensure safe operations.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
10			Water and Levee Crossing	Yes	The Water and Levee Crossing Program mitigates time independent threats and risks associated with transmission pipes in proximity of water and levee crossings. Mitigation, such as pipe replacement or hydrostatic testing, may be required to ensure safe operations.
11			Shallow Pipe Program	Yes	The Shallow Pipe Program identifies, prioritizes and mitigates locations where transmission pipeline has insufficient cover and is vulnerable to exposure from third parties. Mitigation may include pipe replacement, relocation, or addressing inadequate cover.
12			Gas Gathering Program	No	This program supports continued retirement of PG&E's gas gathering facilities. This was based on direction provided by the CPUC regarding concerns on reasonableness of the costs associated with gas gathering facilities. This program is focused on financial rather than safety considerations.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
13			Work Requested by Others Program	No	The primary driver of WRO work is related to public improvement work (new construction for freeways, residential/commercial subdivisions) and not pipeline safety.
14	5	Asset Family - Storage	WELL - GRN Surveys	No	This program is focused on storage facilities, and has no direct impact on line pipe safety.
15			WELL - Noise/Temperature Surveys	No	This program is focused on storage facilities, and has no direct impact on line pipe safety.
16			WELL - Casing Inspection Surveys	No	This program is focused on storage facilities, and has no direct impact on line pipe safety.
17			WELL - Other	No	This program is focused on storage facilities, and has no direct impact on line pipe safety.
18	6	Asset Family - Facilities	Routine Spend C&P	~~Yes~~ No	Typical projects include repair or replacement of failed or malfunctioning equipment and instrumentation including station valves and actuators and other components needed for transmission pipe overpressure protection to ensure the safe operation of transmission line pipe, but primarily relate to compression assets.
19			Critical Documents	No	This program is focused on station facilities, and has no direct impact on line pipe safety.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
20			Physical Security	No	This program includes projects to enhance security measures at critical facilities that impact line pipe safety and protect employees, contractors and the public, but does not meet the safety-related definition.
21			Gill Ranch Operating and Maintenance Costs	No	This program provides funding for operating and maintenance expenses related to the operation of the Gill Ranch Storage Facility. No impact to gas transmission line pipe.
22			Hydrostatic Testing C&P	Yes	Program includes hydrostatic testing of compression and processing facility piping. Many of these facilities impact pressures on the transmission pipelines, and failures could potentially cause over pressure events.
23			Engineering Critical Assessment Phase 2	Yes	The ECA Phase 2 program includes non-destructive mitigation testing activities on station facilities including station piping to avoid or limit system outages, while providing the desired reduction of operational and safety risk.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
24			Routine Spend M&C	Yes	Typical projects include repair or replacement of failed or malfunctioning equipment and instrumentation including station valves and actuators and other components needed for transmission pipe overpressure protection to ensure the safe operation of transmission line pipe.
25			Data Acquisition and Metric Development	No	This program is focused on station facilities that have no direct impact on line pipe safety.
26			Gas Quality Practices Assessment	No	This program is primarily in place for odorization of gas and BTU control for billing. It also includes monitoring, analyzing, and preventing liquid intrusion and sulfur buildup in the pipeline system, but no significant safety impact to the gas transmission pipelines.
27			Hydrostatic Testing M&C	Yes	Program includes hydrotesting of station piping. Many of these stations are pressure limiting or regulating stations that are part of the transmission line and failures could potentially cause over pressure events in the transmission pipelines.
28			Engineering Critical Assessment Phase 1	Yes	Identification and assessment of discrepancies using records containing manufacturing data and operating specifications for the piping within C&P and M&C stations.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
29			Becker Upgrade	No	This program is focused on station facilities that have no direct impact on line pipe safety.
30	7	Corrosion Control	Cathodic Protection Rectifier	Yes	Program includes monitoring of CP rectifiers for transmission assets (a form of safety inspections), including backbone and local pipelines, to ensure they are providing adequate electrical current to prevent corrosion, which can ultimately lead to leaks.
31			Cathodic Protection Monitoring	Yes	Program involves CP monitoring of Transmission assets (a form of safety inspections), including transmission pipe, to evaluate the effectiveness of the CP system by conducting voltage readings which helps ensure adequate protection against corrosion related impacts to the assets.
32			Cathodic Protection Resurvey	Yes	Program includes an evaluation of leak history, field current measurement and documentation updates (a form of safety inspections) to ensure that CP systems are operating effectively, thereby protecting assets including gas transmission pipelines, from corrosion related threats.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
33			Cathodic Protection Troubleshooting	Yes	Work in this program includes the identification and analysis of any deficiencies indicated by CP monitoring. Low reads are often caused by CP system failure or a pipeline coming in physical contact with foreign metallic objects, which can result in leaks in gas transmission pipelines.
34			CP Corrective Maintenance	Yes	Work in this program includes remedial action to correct any deficiencies indicated by CP monitoring. Low reads are often caused by CP system failure or a pipeline coming in physical contact with foreign metallic objects, which can result in leaks in gas transmission pipelines.
35			Corrosion Investigations	Yes	In addition to the routine CP Monitoring performed each year PG&E also performs non-routine testing. Examples of non-routine testing include pipe-to-soil reads conducted during transmission leak repairs and direct examinations.
36			Close Interval Survey	Yes	CIS is an inspection method for determining the adequacy of cathodic protection between the monitoring points on gas transmission pipelines.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
37			AC Interference	Yes	External corrosion can be exacerbated by the presence of electrical interference. This can occur with the presence of AC interference. The AC interference program involves the inspection of transmission pipelines where this interference exists, and the identification of appropriate mitigation.
38			DC Interference	Yes	External corrosion can be exacerbated by the presence of electrical interference. This can occur with the presence of DC interference. The DC interference program involves the inspection of transmission pipelines where this interference exists, and the identification of appropriate mitigation.
39			Casings	Yes	Casings require both annual routine monitoring (a form of inspections) and mitigation as appropriate.
40			Internal Corrosion	Yes	The Internal Corrosion program mitigates the risk of internal corrosion through site-specific Internal Metal Loss Action Plans that contain internal corrosion control monitoring, testing and inspection requirements.
41			Atmospheric Corrosion Inspection and Remediation	Yes	The Atmospheric Corrosion Inspection and Remediation program includes both the inspection for and mitigation of atmospheric corrosion.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
42	8	Gas Transmission Systems Maintenance and Operations	Locate and Mark	Yes	Locate and Mark is required as part of the PG&E Damage Prevention Program. This program is intended to prevent excavation damage by third-party contractors, PG&E construction crews, or others from causing damage to the PG&E transmission pipeline assets.
43			Pipeline Maintenance	Yes	Includes Leak Survey, Leak Repairs, Leak Rechecks, Ground Patrols, Aerial Patrols, Vegetation Management, Pipeline Markers, and other inspection activities.
44			Station Maintenance	No	This program is focused on station facilities that have no direct impact on line pipe safety.
45			Expense Projects	Yes	Expense Projects include gas transmission pipeline repairs including leak, corrosion, weld repairs, right-of-way (erosion) and paint/coatings.
46			StanPac	No	This program is focused on Stanpac facilities, and has no direct impact on line pipe safety.
47	9	Program Management Office	Program Management Office	Yes	Program covers the management of pipeline safety repair/replacement projects.
48	10	Gas System Operations	Gas System Operations	No	This program is focused on gas operations staff, and does not meet the safety-related definition.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
49			Marketing/Sales Strategy	No	This program is focused on gas operations staff, and does not meet the safety-related definition.
50			Compressor Fuel and Power	No	This program is focused on station facilities, and has no direct impact on line pipe safety.
51			Greenhouse Gas Compliance Instruments	No	PG&E requests that it be authorized to recover the cost of compliance instruments (allowances and offsets) it procures to satisfy obligations incurred by any of its gas transmission and storage facilities under the cap-and-trade program instituted by AB 32, the California Global Warming Solutions Act of 2006 (AB 32). This program has no direct impact on line pipe safety.
52	11	Information Technology	Gas Transmission Information Technology Expense	No	These IT projects have no direct impact on line pipe safety.
53	12	Other GT&S Support Plans	Support	No	This program captures building expenses and the forecast for the Process Safety organization. This program has no direct impact on line pipe safety.
54			Environmental Operations	No	This program captures the costs to coordinate PG&E's management of hazardous materials, including remediation. This program has no direct impact on line pipe safety.

Line Item	Chapter	Chapter Name	Program Name	Safety Related	Safety Rationale
55			Read & Investigate Meters	No	This program has no direct impact on line pipe safety.
56			Habitat and Species Protection	No	This program captures the costs to comply with regulations that protect endangered species and sensitive habitats. This program has no direct impact on line pipe safety.
57			Hazardous Waste Disposal & Transportation	No	This program captures the costs of disposing hazardous waste, universal waste, and other materials regulated as industrial wastes. This program has no direct impact on line pipe safety.
58			Manage Various Customer Care Processes	No	This program has no direct impact on line pipe safety.
59			Research and Development	No	This is the cost for projects that are included in PG&E's R&D and Innovation Program that are directly relevant to the GT&S activities. This program has no direct impact on line pipe safety.
60			Change/Maintain Used Gas Meters	No	This program has no direct impact on line pipe safety.